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7 Attorneys for Defendants COUNTY OF MONTEREY and
MICHAEL KANALAKIS
8

9 **IN THE UNITED STATES DISTRICT COURT**
10 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

11 JIMMY D. HAWS, SETH DANIEL HAWS,
12 and MIA SKYE HAWS, minors, by and
through their guardian ad litem, CARRIE A.
13 HAWS, and CARRIE A. HAWS,
individually,

Case No. C 07-02599 JF

STIPULATION FOR PROTECTIVE
ORDER

[Northern District Local Rule 47-4]

14 Plaintiffs,

15 v.

16 COUNTY OF MONTEREY, MICHAEL
17 KANALAKIS, NATIVIDAD MEDICAL
CENTER and DOES 1-300, inclusive,

18 Defendants.
19 _____/

20
21 The parties hereby stipulate that, due to security concerns, any documents produced by
22 Defendants through discovery which consist of architectural drawings, schematics, blue prints, drawings
23 or any document that depicts the physical layout of the Monterey County Jail is hereby subject to a
24 Protective Order that prohibits disclosure of said documents to Plaintiffs or any third parties. Said
25 documents are only to be disclosed to both plaintiffs' counsel and their staffs or any individuals
26 necessary for the preparation of this matter for trial and to any experts retained in the scope of the
27 litigation and/or trial of the above-captioned matter.

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1 IT IS SO STIPULATED:

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4 DATED: August 12, 2008

CHARLES J. McKEE, County Counsel

5
6 By



TRACI A. KIRKBRIDE, Deputy County Counsel

7
8 Attorneys for Defendants COUNTY OF MONTEREY
and MICHAEL KANALAKIS

9
10 DATED: August ____, 2008

MICHAEL B. MOORE

11 Attorney for Plaintiffs JIMMY D. HAWS, SETH
12 DANIEL HAWS, and MIA SKYE HAWS, minors, by
13 and through their *guardian ad litem*, CARRIE A. HAWS,
and CARRIE A. HAWS, individually

14 DATED: August ____, 2008

RALPH W. BOROFF

15 Attorney for Plaintiffs JIMMY D. HAWS, SETH
16 DANIEL HAWS, and MIA SKYE HAWS, minors, by
17 and through their *guardian ad litem*, CARRIE A. HAWS,
18 and CARRIE A. HAWS, individually

19
20 PURSUANT TO STIPULATION, IT IS SO ORDERED.

21 DATED: August ____, 2008

RICHARD SEEBORG

United States Magistrate Judge

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4 DATED: August 12, 2008

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and MICHAEL KANALAKIS

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10 DATED: August 12, 2008

Michael B. Moore
MICHAEL B. MOORE

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12 Attorney for Plaintiffs JIMMY D. HAWS, SETH
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20 PURSUANT TO STIPULATION, IT IS SO ORDERED.

21 DATED: August ____, 2008

22 RICHARD SEEBORG
United States Magistrate Judge

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4 DATED: August 12, 2008

CHARLES J. McKEE, County Counsel

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9 and MICHAEL KANALAKIS

10 DATED: August ____, 2008

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20 PURSUANT TO STIPULATION, IT IS SO ORDERED.

21 DATED: August ____, 2008

22 _____
RICHARD SEEBORG
23 United States Magistrate Judge

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